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13 *Facebook, Inc.*

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16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 FACEBOOK, INC., a Delaware corporation,  
20  
21 Plaintiff/Counterclaim  
Defendant,  
22 v.  
23 BRANDTOTAL LTD., an Israel corporation, and  
UNIMANIA, INC., a Delaware corporation,  
24  
25 Defendants/  
Counterclaim  
Plaintiffs.  
26

Case No. 3:20-CV-07182-JCS

**DECLARATION OF MICHAEL  
CHMELAR IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
SEAL JOINT LETTER BRIEF AND  
ACCOMPANYING EXHIBIT F**

1 I, Michael Chmelar, declare as follows:

2 1. I am Associate General Counsel at Facebook.

3 2. The parties are filing a joint letter brief regarding BrandTotal's early discovery  
4 requests.

5 3. Pursuant to Local Rule 79-5, I submit this Declaration in support of the Administrative  
6 Motion to File Under Seal Confidential Information.

7 4. The redacted portion of the joint letter brief and the accompanying Exhibit F contain  
8 confidential information about Facebook's reports to the Federal Trade Commission under a consent  
9 decree with the Federal Trade Commission. Facebook submits its reports to the Federal Trade  
10 Commission confidentially. Accordingly, Facebook requests that the Court allow the joint letter brief  
11 and accompanying copy of the October Report to be filed under seal.

12  
13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on this 6 day of January 2021 in Redwood City, California.

15  
16 By: /s/ Michael Chmelar  
17 MICHAEL CHMELAR  
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